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BSD CROWN, LTD.
12

13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15 SAN FRANCISCO DIVISION
16

17 BSD CROWN, LTD.,

18 Plaintiff,

19 v.

20 AMAZON.COM, INC.,
21 AMAZON WEB SERVICES, INC. and
TWITCH INTERACTIVE, INC.

22 Defendants.

Case No. 3:23-CV-00057-TSH

**STIPULATION AND [PROPOSED]
ORDER TO AMEND INVALIDITY
CONTENTIONS**

Judge: Hon. Thomas S. Hixson

1 Pursuant to Patent Local Rule 3-6, and Civil Local Rules 6-1(b), 6-2, and 7-12, Plaintiff
2 BSD Crown Ltd. (“Plaintiff”) and Defendants Amazon.com, Inc., Amazon Web Services, Inc., and
3 Twitch Interactive, Inc. (“Defendants”) (collectively, “the Parties”), by and through their respective
4 counsel, hereby stipulate to the following request for leave to amend invalidity contentions served
5 under Patent Local Rule 3-6:

6 WHEREAS, pursuant to Patent Local Rule 3-1, Plaintiff served its disclosure of asserted
7 claims and infringement contentions (“Infringement Contentions”) on July 21, 2023;

8 WHEREAS on August 11, 2023, Defendants served a subpoena for the production of
9 documents related to the RealNetworks system on RealNetworks LLC;

10 WHEREAS, pursuant to Patent Local Rule 3-3, Defendants served their Invalidity
11 Contentions on September 13, 2023, which assert the RealNetworks system as a prior art reference;

12 WHEREAS, Defendants served a subpoena and notice of subpoena on Jeffrey Ayars, a
13 former manager and Vice President of Product Engineering at RealNetworks LLC, on February 1,
14 2024;

15 WHEREAS Defendants deposed Mr. Ayars on March 27, 2024;

16 WHEREAS this case was stayed on March 29, 2024 (ECF No. 109);

17 WHEREAS on April 1, 2024, counsel for Defendants informed counsel for Plaintiff that
18 Defendants were in the process of supplementing their invalidity contentions based on Mr. Ayars’
19 testimony, but that it would be procedurally improper to seek leave to serve supplemental
20 contentions while the litigation was stayed;

21 WHEREAS the parties jointly moved to lift the stay on July 3, 2025 (ECF No. 136);

22 WHEREAS the Court lifted the stay on July 3, 2025 and scheduled a case management
23 conference for August 26, 2025 (ECF No. 136);

24 WHEREAS Counsel for Defendants asked Counsel for Plaintiff to stipulate to an
25 amendment of Defendants’ RealNetworks invalidity chart based on Mr. Ayars’ testimony on
26 August 13, 2025;

27 WHEREAS on August 18, 2025, counsel for Plaintiff asked counsel for Defendants for a
28 draft of the proposed amendment;

1 WHEREAS counsel for Defendants sent counsel for Plaintiff a draft of the proposed
2 supplemental RealNetworks invalidity chart on August 22, 2025;

3 WHEREAS The Court held a case management conference on August 26, 2025 (ECF No.
4 141);

5 WHEREAS counsel for Plaintiff informed counsel for Defendants that it would not oppose
6 the proposed amendment on September 10, 2025;

7 NOW THEREFORE, the Parties hereby stipulate to and request an order granting
8 Defendants leave to supplement their invalidity contentions to include Defendants' proposed
9 supplemental RealNetworks invalidity chart that was circulated to Plaintiff on August 22 and
10 September 12, 2025.

11 IT IS SO STIPULATED.

12 Dated: September 23, 2025

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14 By: */s/ Francisco A. Villegas*

By: */s/ Nathan B. Sabri*

15 Francisco A. Villegas
VILLEGAS & CEFO LLP

Nathan B. Sabri
PERKINS COIE LLP

16 *Counsel for Plaintiff*
17 BSD CROWN, LTD.

Counsel for Defendants
18 AMAZON.COM, INC., AMAZON WEB
19 SERVICES, INC., AND AMAZON.COM
20 SERVICES, LLC
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FILER'S ATTESTATION

I, Nathan B. Sabri, pursuant to Civil Local Rule 5-1(h), attest that all other signatories listed,
and on whose behalf the filing is submitted, have concurred in the filing of the document.

Dated: September 23, 2025

By: /s/ Nathan B. Sabri
Nathan B. Sabri